

Exhibit 5-U

Civil Rights Responsibilities Checklist

CIVIL RIGHTS RESPONSIBILITIES CHECKLIST	
Dates(s)	1. <u>Civil Right requirements at project start-up (before CDBG approval of first draw)</u>
	Set up a CDBG Civil Rights file (Chapter 1, page 1-24).
	1a. Adopt a Fair Housing Resolution (Exhibit 5-M). Follow-up: Display fair housing posters (Exhibit 5-N), start actions to affirmatively further fair housing (page 5-10 ff).
	1b. Adopt Nondiscrimination (Equal Employment Opportunity/EEO) Policy Resolution (Exhibit 5-A) and start EEO implementation.
	1c. Adopt ADA & Section 504 Complaint Resolution Procedures (Exhibit 5-R). Designate an ADA/Section 504 compliance coordinator.
	1d. Conduct an ADA Self-Evaluation Inventory. (See pages 5-23 and following). Prepare an ADA Transition Plan for Handicapped Accessibility to Public Facilities (Exhibit 5-S).
	1.e Adopt a Hatch Act Resolution (Exhibit 5-Q).
Date(s):	2. <u>Civil rights responsibilities after project start-up</u>
	2a. Maintain (in the project's Civil Rights file) documentation/records of project activities related to progress concerning on-going implementation of and follow-through on each of the responsibilities 1.a through 1.e (as listed above and explained in chapter 5). See page 5-34 and following regarding record-keeping requirements.
	2b. Publish Exhibit 5-B (sample <i>Section 3 Public Notice: Economic Opportunities for Low-Income and Very Low-Income Persons</i>) or its equivalent.
	2c. Place the required appropriate contract language regarding civil rights in bid documents and in all contracts. See Chapter 3, <u>Procurement</u> and Exhibit 3-F.
	2d. Take all civil rights protection action necessary (and keep records of actions taken) during the entire course of your project to ensure that no one is discriminated against in receiving services and benefits from the CDBG project, especially persons in the protected groups (page 5-4 and 5-5).
	2e. If your project includes <i>direct benefits</i> to individuals and households: Gather and record the information that shows how your project meets requirements that are applicable to those CDBG projects with direct benefits to individuals: Keep records of direct beneficiaries by using Exhibit 5-D and Exhibit 5-E.
	2f. Complete Exhibit 5-J, <i>Contract Reporting Form</i> , at the time that each contract and subcontract (including contractors and subcontractors that are not minority owned) exceeding \$10,000 is awarded.
	2g. Assure contractor affirmative action responsibilities concerning contracting with Disadvantaged Business Enterprises. (See Chapter 5, page 5-16 and following).